

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

CIVIL NO.: 17-BK-03283 (LTS)

PROMESA

Plaintiff,

TITLE III

As representative of

THE COMMONWEALTH OF PUERTO
RICO

Debtor¹

**RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE NINETY
FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO AND EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO
[ECF NO. 10393]**

TO THE HONORABLE COURT:

COMES NOW creditor **AIDA SANCHEZ IRIZARRY**, on her own behalf (pro-se), and respectfully responds in opposition to the Third Notice of Adjournment as to Certain Claims and Submission of Amended Schedule for the 91st Omnibus Objection (Non-Substantive) of The Commonwealth of Puerto Rico [ECF No. 10393] “the Objection”), and states and prays as follows:

1. The Commonwealth of Puerto Rico (“Debtor”) has objected to creditor Aida Sánchez Irizarry’s timely filed proofs of claim as deficient.

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Aida Sánchez Irizarry has filed a valid proof of claim pertaining to unpaid salaries claimed on her own behalf as a qualifying teacher who worked for the debtor's Department of Education from August 2nd, 1971 to July 27th, 2001.

3. This claim is related to the state law number 89 of 1979, commonly known as "Romerazo Law" and "Ley de Retribución Uniforme", a law that was approved in 1979 to increase the salaries of all qualifying teachers working for the Department of Education.

4. The quantity of the claim is undefined because this information is in possession of the debtor, who has the responsibility to calculate the salary increase steps owed to the creditor and who keeps the creditor's official employee file. The salary increase calculations are a highly technical issue that the debtor has modified in state courts, at the collective bargaining table and at administrative levels along the years, before filing the present case 17-BK-03283.

5. I am accompanying additional documents that sustain my claim. The best evidence as previously stated is in possession of the debtor.

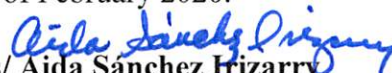
6. In relation to Debtor's Objection No. 467, Prime Clerk Claim No. 63853, Aida Sánchez Irizarry moves the Court to deny Debtor's objection.

7. I, Aida Sánchez Irizarry expressly reserve any rights in connection therewith and request that, the non-substantive disallowance requested by Debtor should not prejudice Aida Sánchez Irizarry's rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

I hereby certify I have served notification of this document by postal mail to Counsel for the Oversight Board and Counsel for the Creditors' Committee, as directed in the abovementioned Omnibus Objection.

In Hormigueros, Puerto Rico, on this 17th day of February 2020.


s/ Aida Sánchez Irizarry

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